

Pacific OCS Programmatic EIS on Decommissioning
Scope Draft Work Plan
June 2018

Federal actions for a Decommissioning Programmatic EIS

A programmatic EIS does not require that the agency have an action, only that the anticipated future activities be described in such a fashion that a clear future action can use the scope of activities described in the PEIS. You might call these agency responsibilities rather than a formal NEPA-type action. Below are some responsibilities BSEE and BOEM might contribute to the development of a PEIS.

BSEE

- Providing technical/engineering scenarios that could arise in future decommissioning applications
- Inspection responsibilities including safety, engineering, pollution prevention
- Environmental enforcement of BMPs or mitigations from PEIS
- Others?

BOEM

- Performs the impact analysis based on a generalized decommissioning scenario
- Based on the analysis, selects alternatives according to the generalized scenario and performs impact analyses for those (e.g., use of explosives, reefing, removal of pipelines and power cables, disposition of shell mounds, etc.)
- Develops guidelines, BMPs, and/or mitigation measures
- Others?

ALTERNATIVES WITHIN A GENERAL DECOMMISSIONING PROJECT

ASSUMPTIONS

- Analysis would not be a joint Federal-State effort (final document would not be an EIS-EIR), primarily because of the expectation that the state will not want to be constrained by the new federal page limits and one-year schedule.
- The risk of legal challenge to any NEPA document is much greater for the Pacific Region in the 9th Circuit Court.
- A programmatic EIS will not eliminate the need for a site-specific environmental analysis, likely an EIS, since actual applications will include specifics on timing and detail of the activities, which may differ from those analyzed in the PEIS. If an EA is produced, tiered from the PEIS, it is likely that objections from state and local stakeholders would arise.

No Action

- Required under NEPA
- Not allowed under BSEE regulations
- Could result in continuing non-economic production

Platform jacket removal

Alternative 1: Completely remove platform jacket using cutting techniques (no explosives) by developing our own or adopting or modifying GOMR guidelines and mitigation scenarios and 15 feet below the mud line (30 § 250.1728)

Primary impacting factors: Noise (we don't know how noisy of an operation this is, likely less so than explosives and less impulsive)

Primary resource issues: Marine Mammals, Sea Turtles, Fishes, Commercial Fishing

Alternative 2: Completely remove platform jacket using cutting techniques (no explosives) by developing our own or adopting or modifying GOMR guidelines and mitigation scenarios and to mud line or the top of the shell mound, if present

Primary impacting factors: Noise (we don't know how noisy of an operation this is, likely less so than explosives and less impulsive)

Primary resource issues: Marine Mammals, Sea Turtles, Fishes, Commercial Fishing

Alternative 3: Completely remove platform jacket with explosives if necessary by developing our own or adopting or modifying GOMR guidelines and mitigation scenarios. Note that this would require interacting with federal, state and local agencies. Remove 15 feet below the mudline.

Primary impacting factor: Noise

Primary resource issues: Marine Mammals, Sea Turtles, Fishes, Commercial Fishing

Alternative 4: Completely remove platform jacket with explosives if necessary by developing our own or adopting or modifying GOMR guidelines and mitigation scenarios. Note that this would require interacting with federal, state and local agencies and to mud line or the top of the shell mound, if present

Primary impacting factor: Noise

Primary resource issues: Marine Mammals, Sea Turtles, Fishes, Commercial Fishing

Alternative 5: Partially remove and leave platform jacket in place from 85 ft. below sea surface to seabed

Primary impacting factors: Emissions, Pollution, Habitat Alteration, Sea floor Disturbance, Night Lighting, Space-Use Conflicts, Destruction of Significant Cultural Resource

Primary resource issues: Air Quality, Water Quality, Benthic Resources, Fishes, Marine Mammals, Sea Birds, Commercial Fishing, Recreational Use, Cultural Resources

Alternative 6: Leave entire platform in place (e.g. National Historic Preservation Act, not alternate use)

Primary impacting factors: Habitat Alteration, Night Lighting, Space-Use Conflicts

Primary resource issues: Commercial Fishing, Recreational Uses

Pipelines and power cable decommissioning

This activity would or would not occur regardless of the method of platform removal. Some short sections of pipelines and power cables would need to be removed or moved out of the way to allow the complete removal of a platform. It is obvious that there would be greater impacts due to the removal of pipelines and power cables than leaving them in place.

Alternative 1: Completely remove pipelines and power cables

Primary impacting factors: Emissions, Noise, Habitat Alteration, Turbidity, Sea floor Disturbance, Space-Use Conflicts

Primary resource issues: Air Quality, Water Quality, Benthic Resources, Fishes, Marine Mammals, Marine Birds, Commercial Fishing, Cultural Resources

Alternative 2: Abandon-in-place some or all pipelines and power cables

No major impacting factors or resources issues, although others may argue differently

The following are “options” to the 6 primary alternatives. They may or may not be a true alternative since most of the impacts would occur under the 6 primary alternatives while these options could only add some other facet to the overall project.

Platform removal timing and areal restrictions

Option 1: No restriction (requires BSEE waiver of 1 year post-shut-in of production)

Same impacting factors and resource issues as above.

Option 2: Set maximum number of projects within an area and time frame

Same impacting factors and resource issues as above but may concentrate some into a smaller area and extend the effect over a longer timeframe.

Transportation to shore and disposal of removed materials

A better description of alternatives and associated potential impacts for the transportation and disposal of materials is a major information need. The options for this facet of the overall project are presently unknown

Option 1: By marine vessel or barge

Option 2: Hopping or dragging to a disposal or reefing site or to a site where it could be loaded onto a barge

Option 3: Landfill or other onshore disposal option including recycling

Option 4: Offshore disposal (e.g. an approved EPA dump site)

Primary impacting factors: Emissions, Pollution, Habitat Alteration, Turbidity, Sea floor disturbance, Space-Use Conflicts

Primary resource issues: Air quality, Benthic Resources, Fishes, Commercial Fishing, Port Infrastructure

Shell mounds

NOTE: A major information need is the spatial extent, thickness (volume), and toxicity of shell mounds under each platform.

Option 1: Remove shell mound material to an onshore landfill so that other uses of the OCS are not inhibited

Option 2: Remove shell mound material to an offshore disposal site so that other uses of the OCS are not inhibited

Option 3: Abandon-in-place all shell mound material and cap with inert material to prevent potential leaching of contaminants

Option 4: Abandon-in-place all shell mound material and do not cap with inert material

Primary impacting factors: Emissions, Pollution, Habitat Alteration, Turbidity, Sea floor Disturbance, Space-Use Conflicts

Primary resource issues: Air Quality, Water Quality, Benthic Resources, Fishes, Commercial Fishing

Site clearance

Option 1: Trawl,

Primary impacting factors: Habitat Alteration, Turbidity, Sea floor Disturbance, Space-Use Conflicts

Primary resource issues: Water Quality, Benthic Resources, Fishes, Commercial Fishing, Cultural Resources

Other options: Visual inspection, Sonar

No impacting factors or resource issues